

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

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MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

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Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

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Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**ADVISORY**

Texas's Motion To Enter Order [Dkt. No. 299], in which it tries to require the disclosure of the federal databases, should be denied summarily for the reasons set forth in the opposition of the United States [Dkt. No. 300]. Private plaintiffs stress further that:

1. The proposed Order submitted by the United States, and supported by all private plaintiffs, treats all parties fairly and does not treat Texas unequally in any way. What Texas seeks to obscure in its arguments to this Court is that there are two categories of databases that are relevant to this case. First, there is the TEAM voter registration database. Under the proposed Order, all parties would have equal access to the data contained therein. Second, there are the state and federal databases for the types of photo identification permitted by SB 14, and a federal database related to SB 14's limited disability exception. Only the Justice Department and

Texas have access to the state databases in this regard, and no party will be able to examine the data contained in the federal databases. Thus, Texas is not being treated unfairly.

2. Texas's motion is based on the inaccurate assertion that, as a result of the disclosure of the TEAM database to the private plaintiffs, private plaintiffs would now be in a position to run "additional algorithms" of matches with the ID databases. This is not, and cannot, be the case, because private plaintiffs will not have access to the ID databases and, without these databases, no such algorithms can be run.

There is no reason to order the release of the federal databases to the parties.

Respectfully submitted,

s/ Ezra Rosenberg

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 30, 2014, I served a true and correct copy of the foregoing via the Court's ECF system on all counsel of record.

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